

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>W. R. GRACE &amp; CO., et al.,</b>	§	<b>Case No. 01-01139 (JKF)</b>
	§	
<b><i>Debtors.</i></b>	§	<b>Jointly Administered</b>
	§	
	§	<b>Objection Deadline: 8/5/2010; 4:00 PM ET</b>
	§	<b>Hearing Date: 9/13/2010; 10:30 AM ET</b>

**SIXTH QUARTERLY APPLICATION OF ALAN B. RICH, ESQ. FOR  
COMPENSATION FOR SERVICES AND REIMBURSEMENT OF  
EXPENSES AS COUNSEL TO THE LEGAL REPRESENTATIVE FOR  
FUTURE ASBESTOS-RELATED PROPERTY DAMAGE CLAIMANTS  
AND HOLDERS OF DEMANDS FOR THE 36<sup>th</sup> QUARTERLY  
PERIOD FROM JANUARY 1, 2010 THROUGH MARHC 31, 2010**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Alan B. Rich, Esq., pursuant to sections 327, 330 and 331 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the Retention Order (as defined below), the Administrative Order Under 11 U.S.C. §§105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Professionals and Official Committee Members (the "Interim Compensation Order"), the Amended Administrative Order under 11 U.S.C. §§105(a) and 331 Establishing Revised Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Official Committee Members (the "Amended Interim Compensation Order") and Del. Bankr. LR 2016-2, and hereby applies for an order allowing him (i) compensation in the amount of \$54,600.00 for the reasonable and necessary legal services he has rendered to the Hon. Alexander M. Sanders, Jr., Legal Representative for Future Asbestos-Related Property

Damage Claimants and Holders of Demands and (ii) reimbursement of actual and necessary expenses that he has incurred in the amount of \$2,752.84, for a total of \$57,352.84 or one hundred percent (100%) of all compensation and expense reimbursement requested, for the period January 1, 2010 through March 31, 2010 (the "Quarterly Fee Application"), and in support of this Quarterly Fee Application, would respectfully show as follows:

### SUMMARY

Name of Applicant:	Alan B. Rich, Esq.
Authorized to Provide Services To:	Hon. Alexander M. Sanders, Jr., Legal Representative for Future Asbestos- Related Property Damage Claimants and Holders of Demands
Date of Retention:	September 29, 2008 ( <i>nunc pro tunc</i> )
Period for Which Compensation and Reimbursement is Sought:	January 1, 2010 through March 31, 2010
Amount of Fees Sought as Actual Reasonable and Necessary:	\$54,600.00
Amount of Expenses Sought as Actual, Reasonable and Necessary:	\$2,752.84
This is a(n): <input type="checkbox"/> Monthly <input checked="" type="checkbox"/> Quarterly <input type="checkbox"/> Interim <input type="checkbox"/> Final Application	

### PRIOR APPLICATIONS

Date Filed	Period Covered	Requested Fees <sup>1</sup>	Requested Expenses	Status of Fees	Status of Expenses
11/15/2008	9/29/2008 to 9/30/2008	\$5,796.00	\$693.50	Paid	Paid
11/15/2008	10/1/2008 to 10/30/2008	\$24,380.00	\$3,821.18	Paid	Paid

---

<sup>1</sup> At 80% of the total incurred.

12/11/2008	11/1/2008 to 11/30/2008	\$35,326.00	\$4,010.79	Paid	Paid
1/2/2009	12/1/2008 to 12/31/2008	\$18,510.00	\$1,482.39	Paid	Paid
2/1/2009	1/1/2009 to 1/31/2009	\$31,740.00	\$2,717.34	Paid	Paid
3/2/2009	2/1/2009 to 2/28/2009	\$32,614.00	\$2,420.56	Paid	Paid
4/2/2009	3/1/2009 to 3/31/2009	\$27,186.00	\$4,556.30	Paid	Paid
5/5/2009	4/1/2009 to 4/30/2009	\$25,898.00	\$2,612.62	Paid	Paid
6/2/2009	5/1/2009 to 5/31/2009	\$56,304.00	\$5,301.01	Paid	Paid
7/1/2009	6/1/2009 to 6/30/2009	\$56,902.00	\$7,769.09	Paid	Paid
8/22/2009	7/1/2009 to 7/31/2009	\$40,296.00	\$4,279.60	Paid	Paid
9/1/2009	8/1/2009 to 8/31/2009	\$56,442.00	\$6,484.97	Paid	Paid
10/1/2009	9/1/2009 to 9/30/2009	\$65,184.00	\$6,064.05	Paid	Paid
11/1/2009	10/1/2009 to 10/31/2009	\$28,848.00	\$2,337.16	Paid	Paid
12/1/2009	11/1/2009 to 11/30/2009	\$16,176.00	\$10.35	Paid	Paid
1/3/2010	12/1/2009 to 12/31/2009	\$7,200.00	\$194.00	Paid	Paid
2/1/2010	1/1/2010 to 1/31/2010	\$29,088.00	\$2,415.28	Paid	Paid
3/2/2010	2/1/2010 to 2/28/2010	\$7,392.00	\$187.00	Paid	Paid
4/1/2010	3/1/2010 to 3/31/2010	\$7,200.00	\$150.56	Paid	Paid
5/3/2010	4/1/2010 to 4/30/2010	\$11,040.00	\$805.28	Paid	Paid
6/1/2010	5/1/2010 to 5/31/2010	\$5,808.00	\$44.00	Paid	Paid

7/1/2010	6/1/2010 to 6/30/2010	\$9,792.00	\$779.81	Pending	Pending
----------	--------------------------	------------	----------	---------	---------

Alan B. Rich is the only attorney providing services in this Fee Application period. Mr. Rich has practiced law for 25 years, and his billing rate is \$600 per hour. In this Quarterly Application period Mr. Rich billed 91.0 hours,<sup>2</sup> for a total amount billed of \$54,600.00, of which 80% (\$43,685.00) has already been paid, leaving the amount not yet approved or paid of \$10,920.00.

The time for preparation of this fourth Quarterly Application is approximately 2.0 hours, for which \$1,200.00 will be requested in a future application.

COMPENSATION BY PROJECT CATEGORY

Project Category	Hours	Amount
Disclosure Statement and Confirmation	66.8	\$40,080.00
Travel	23.2 (at 100%)	\$6,960.00 (at 50%)
Fee Applications	12.6	\$7,560.00
TOTAL	102.6 (with travel at 100%)	\$54,600.00

EXPENSE SUMMARY

Description	Expense
Travel	\$2,415.28
Court Call	\$37.00
Airline Fees	\$300.00
PACER	\$0.56
TOTAL	\$2,752.84

---

<sup>2</sup> Non-Productive travel time is included in this figure, but at 50% of the actual time.

APPLICATION

1. On April 2, 2001 , (the "Petition Date") each of the Debtors filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code (the "Chapter 11 Cases"). On April 2, 2001, the Court entered an order procedurally consolidating the Chapter 11 Cases for administrative purposes only. Since the Petition Date, the Debtors are continuing to operate their businesses and manage their properties and assets as debtors-in-possession pursuant to sections 1107(a) and 1108 of the United States Bankruptcy Code.

2. On May 3, 2001 , the Court entered an Interim Compensation Order, as amended by the Amended Interim Compensation Order, establishing procedures for monthly compensation and reimbursement of expenses of professionals (each such application, a "Monthly Fee Application"), and whereby any notice party listed in the Amended Interim Compensation Order may object to such Monthly Fee Application. If no notice party objects to professional's Monthly Fee Application within twenty (20) days after the date of service of the Monthly Fee Application, the applicable professional may submit to the Court a certification of no objection authorizing the interim compensation and reimbursement of eighty percent (80%) of the fees requested and one hundred percent (100%) of the expenses requested, subject to the filing and approval of the interim and final fee applications of the professional.

3. Furthermore, and also pursuant to the Amended Interim Compensation Order, within forty-five (45) days of the end of each quarter, professionals are required to file and serve, upon the notice parties, a quarterly request (a "Quarterly Fee Application") for interim Court approval and allowance of the Monthly Fee Applications filed during the quarter covered

by that Quarterly Fee Application. If the Court grants the relief requested by the Quarterly Fee Application, the Debtors are authorized and directed to pay the professional 100% of the fees and expenses requested in the Monthly Fee Applications covered by that Quarterly Fee Application, less any amounts previously paid in connection with the Monthly Fee Applications. Any payment made pursuant to the Monthly Fee Applications or a Quarterly Fee Application is subject to final approval of all fees and expenses at a hearing on the professional's final fee application.

4. By an order of this Court, the PD FCR was authorized to retain Alan B. Rich as his counsel, effective as of September 29, 2008 (the "Retention Order"). The Retention Order authorizes the Debtors to compensate Rich at his hourly rate charged for services of this type and to be reimbursed for actual and necessary out-of-pocket expenses that he incurred, subject to application to this Court in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, all applicable local rules and orders of this Court.

5. This Quarterly Fee Application, which is submitted in accordance with the Amended Interim Compensation Order, is Rich's Sixth Quarterly Fee Application for compensation for services rendered in connection with the Chapter 11 Cases and covers the 36<sup>th</sup> Quarterly fee period of January 1, 2010 through March 31, 2010 (the "Fee Period").

6. Rich has filed with the Court the following Monthly Fee Applications for interim compensation during the Fee Period:

- (a) Application of Alan B. Rich, Esq. For Compensation for Services and Reimbursement of Expenses as Counsel to the Legal Representative for Future Asbestos-related Property Damage Claimants And Holders of Demands for the Seventeenth Monthly Interim Period from January 1, 2010 Through January 31, 2010, seeking \$29,088.00 in fees (80% of \$36,360.00) and \$2,415.28 in expenses;

- (b) Application of Alan B. Rich, Esq. For Compensation for Services and Reimbursement of Expenses as Counsel to the Legal Representative for Future Asbestos-related Property Damage Claimants And Holders of Demands for the Eighteenth Monthly Interim Period from February 1, 2010 Through February 28, 2010, seeking \$7,397.00 in fees (80% of \$9,240.00) and \$187.00 in expenses;
- (c) Application of Alan B. Rich, Esq. For Compensation for Services and Reimbursement of Expenses as Counsel to the Legal Representative for Future Asbestos-related Property Damage Claimants And Holders of Demands for the Nineteenth Monthly Interim Period from March 1, 2010 Through March 31, 2010, seeking \$7,200.00 in fees (80% of \$9,000.00) and \$150.56 in expenses.

7. The monthly fee applications covered by this Quarterly Fee Application contain detailed daily time logs describing the actual and necessary services provided by Rich during the Fee Period, as well as other detailed information required to be included in fee applications. The Seventeenth, Eighteenth and Nineteenth monthly fee applications (collectively, the "Applications") are attached hereto as Exhibits "1," "2" and "3" respectively.

8. The periods for objecting to the fee and expense reimbursements relating to the Seventeenth, Eighteenth and Nineteenth monthly fee applications have each passed without any objections being filed, whereupon Rich filed Certificates of No Objection with the Court, and Rich has been paid interim compensation and reimbursement of 80% of the fees and 100% of the expenses requested.

9. Rich has filed five prior Quarterly Fee Applications.

10. By this Sixth Quarterly Fee Application, Rich requests that the Court approve the interim allowance of compensation for professional services rendered and the reimbursement of actual and necessary expenses incurred by Rich from January 1, 2010 through March 31, 2010, less any amounts previously paid to Rich pursuant to the Monthly Fee Applications and the

procedures set forth in the Amended Interim Compensation Order. As stated above, the full scope of the services provided and the related expenses incurred are fully described in the Monthly Fee Applications that already have been filed with the Court.

11. Rich reserves his right to seek at a later date compensation for services rendered and expenses incurred during the applicable period that are not otherwise included in the relevant monthly fee application.

12. At all relevant times, Rich has been a disinterested person as that term is defined in Section 101(14) of the United States Bankruptcy Code, as modified by section 1107(b) of the United States Bankruptcy Code and has not represented or held an interest adverse to the interest of the Debtors.

13. All services for which compensation is requested by Rich were performed for or on behalf of the PD FCR and not on behalf of any committee, creditor, or other person.

14. Rich believes that this Quarterly Fee Application complies with the requirements of Del. Bankr. LR 2016-2 and the Amended Interim Compensation Order.

15. During the Interim Period, Rich has received no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with these Chapter 11 Cases, other than the interim compensation payments pursuant to the Amended Interim Compensation Order. There is no agreement or understanding between Rich and any other person for the sharing of compensation to be received for services rendered in these cases.

16. The professional services and related expenses for which Rich requests interim allowance of compensation and reimbursement of expenses were rendered and incurred in connection with these cases in the discharge of Rich's professional responsibilities as counsel for



the PD FCR in the Chapter 11 Cases. Rich's services have been necessary and beneficial to the PD FCR as well as the Debtors and their estates, creditors, and other parties in interest.

17. Pursuant to Fed R. Bankr. P. 2016(b), Rich has not shared, nor has agreed to share: (a) any compensation it has received or may receive with another party or person, or (b) any compensation another person or party has received or may receive in connection with the Chapter 11 Cases.

WHEREFORE, Alan B. Rich, Esq. respectfully requests that the Court enter an order, providing that (a) for the period from January 1, 2010 through March 31, 2010, an administrative allowance be made to Rich in the sum of \$54,600.00 as compensation for reasonable and necessary professional services rendered to the PD FCR and, in the sum of \$2,752.84 for reimbursement of actual and necessary costs and expenses incurred, for a total of \$57,352.84; (b) that the Debtors be authorized and directed to pay to Rich the outstanding amount of such sums, less any sums previously paid to Rich pursuant to the Monthly Fee Applications and the procedures set forth in the Amended Interim Compensation Order and (c) this Court grant such other and further relief to which Rich is justly entitled.

Respectfully Submitted,



---

Alan B. Rich  
Texas Bar No. 16842350  
4244 Renaissance Tower  
1201 Elm Street  
Dallas, Texas 75270  
(214) 744-5100  
(214) 744-5101 [fax]  
[arich@alanrichlaw.com](mailto:arich@alanrichlaw.com)

COUNSEL TO HON. ALEXANDER  
M. SANDERS, JR., LEGAL  
REPRESENTATIVE FOR FUTURE  
ASBESTOS-RELATED PROPERTY  
DAMAGE CLAIMANTS AND HOLDERS  
OF DEMANDS

DECLARATION

Alan B. Rich, declares as follows:

I am the counsel hired by the PD FCR with the approval of the Court, and am familiar with the legal services which I rendered to the PD FCR. I have reviewed the foregoing Application and the facts set forth therein are true and correct to the best of my knowledge, information and belief. I believe that this Application substantially complies with Local Bankruptcy Rules for the District of Delaware.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 16, 2010.



**CERTIFICATE OF SERVICE**

I certify that on the 16<sup>th</sup> day of July, 2010, this document was served through the ECF system on all persons who have requested notice through the ECF system, and upon the special notice parties by electronic mail.

A handwritten signature in black ink, appearing to read "MBRIL", is positioned above a horizontal line.

# **EXHIBIT 1**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>W. R. GRACE &amp; CO., et al.,</b>	§	<b>Case No. 01-01139 (JKF)</b>
	§	
<b><i>Debtors.</i></b>	§	<b>Jointly Administered</b>
	§	
	§	<b>Objection Deadline: 2/21/2010</b>
	§	<b>Hearing Date: TBD (if needed)</b>

**SUMMARY OF APPLICATION OF ALAN B. RICH, ESQ. FOR  
COMPENSATION FOR SERVICES AND REIMBURSEMENT OF  
EXPENSES AS COUNSEL TO THE LEGAL REPRESENTATIVE FOR  
FUTURE ASBESTOS-RELATED PROPERTY DAMAGE CLAIMANTS AND  
HOLDERS OF DEMANDS FOR THE SEVENTEENTH MONTHLY INTERIM  
PERIOD FROM JANUARY 1, 2010 THROUGH JANUARY 31, 2010**

Name of Applicant:	Alan B. Rich, Esq.
Authorized to Provide Services To:	Hon. Alexander M. Sanders, Jr., Legal Representative for Future Asbestos- Related Property Damage Claimants and Holders of Demands
Date of Retention:	September 29, 2008 ( <i>nunc pro tunc</i> )
Period for Which Compensation and Reimbursement is Sought:	January 1, 2010 through January 31, 2010
Amount of Fees Sought as Actual Reasonable and Necessary:	\$29,088.00 [80% of \$36,360.00]
Amount of Expenses Sought as Actual, Reasonable and Necessary:	\$2,415.28
This is a(n):	<input checked="" type="checkbox"/> Monthly <input type="checkbox"/> Interim <input type="checkbox"/> Final Application

PRIOR APPLICATIONS

Date Filed	Period Covered	Requested Fees <sup>1</sup>	Requested Expenses	Status of Fees	Status of Expenses
11/15/2008	9/29/2008 to 9/30/2008	\$5,796.00	\$693.50	Paid	Paid
11/15/2008	10/1/2008 to 10/30/2008	\$24,380.00	\$3,821.18	Paid	Paid
12/11/2008	11/1/2008 to 11/30/2008	\$35,326.00	\$4,010.79	Paid	Paid
1/2/2009	12/1/2008 to 12/31/2008	\$18,510.00	\$1,482.39	Paid	Paid
2/1/2009	1/1/2009 to 1/31/2009	\$31,740.00	\$2,717.34	Paid	Paid
3/2/2009	2/1/2009 to 2/28/2009	\$32,614.00	\$2,420.56	Paid	Paid
4/2/2009	3/1/2009 to 3/31/2009	\$27,186.00	\$4,556.30	Paid	Paid
5/5/2009	4/1/2009 to 4/30/2009	\$25,898.00	\$2,612.62	Paid	Paid
6/2/2009	5/1/2009 to 5/31/2009	\$56,304.00	\$5,301.01	Paid	Paid
7/1/2009	6/1/2009 to 6/30/2009	\$56,902.00	\$7,769.09	Paid	Paid
8/22/2009	7/1/2009 to 7/31/2009	\$40,296.00	\$4,279.60	Paid	Paid
9/1/2009	8/1/2009 to 8/31/2009	\$56,442.00	\$6,484.97	Paid	Paid
10/1/2009	9/1/2009 to 9/30/2009	\$65,184.00	\$6,064.05	Paid	Paid
11/1/2009	10/1/2009 to 10/31/2009	\$28,848.00	\$2,337.16	Paid	Paid
12/1/2009	11/1/2009 to 11/30/2009	\$16,176.00	\$10.35	Paid	Paid
1/3/2010	12/1/2009 to 12/31/2009	\$7,200.00	\$194.00	Paid	Paid

---

<sup>1</sup> At 80% of the total incurred.

Alan B. Rich is the only attorney providing services in this Fee Application period. Mr. Rich has practiced law for 25 years, and his billing rate is \$600 per hour. In this Application period Mr. Rich billed 60.6 hours,<sup>2</sup> for a total amount billed of \$36,360.00 of which 80% is currently sought, in the amount of \$29,088.00, plus 100% of the expenses incurred during this period, in the amount of \$2,415.28, for a total currently sought of \$31,503.28.

As stated above, this is the Seventeenth application for monthly fees and expenses. The time for preparation of this Application is approximately 1.5 hours, for which \$900.00 will be requested in a future application.

COMPENSATION BY PROJECT CATEGORY

Project Category	Hours	Amount
Confirmation	46.4	\$27,840.00
Travel	23.2 (100%)	\$6,960 (50%)
Fee Application Matters (Incl. FCR & Local Counsel)	2.6	\$1,560.00
<b>TOTAL</b>	<b>72.2</b>	<b>\$36,360.00</b>

EXPENSE SUMMARY

Description	Expense
Travel	\$2,415.28
<b>TOTAL</b>	<b>\$2,415.28</b>

Detail of the fees and expenses billed is attached hereto as Exhibit A.

---

<sup>2</sup> Non-Productive travel time, if any, is included in this figure, but at 50% of the actual time.

CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 2016-2(f)

I, Alan B. Rich, a professional person seeking approval of this Monthly Fee Application, and having reviewed the requirements of Local Rule 2016-2, hereby certify that in my opinion, this Monthly Fee Application complies with Local Rule 2016-2.

Respectfully Submitted,



---

Alan B. Rich, Esq.  
Texas Bar No. 16842350  
1201 Elm Street, Suite 4244  
Dallas, Texas 75270  
(214) 744-5100  
(214) 744-5101 [fax]  
[arich@alanrichlaw.com](mailto:arich@alanrichlaw.com)

COUNSEL TO HON. ALEXANDER  
M. SANDERS, JR., LEGAL  
REPRESENTATIVE FOR FUTURE  
ASBESTOS-RELATED PROPERTY  
DAMAGE CLAIMANTS AND HOLDERS  
OF DEMANDS

**CERTIFICATE OF SERVICE**

I certify that on the 1<sup>st</sup> day of February, 2010, this document was served through the ECF system on all persons who have requested notice through the ECF system, and upon the special notice parties by electronic mail.





# EXHIBIT A

# Al an B. Rich

*Attorney and Counselor*  
4244 Renaissance Tower  
1401 Elm Street  
Dallas, Texas 75270  
Telephone 214.744.5100  
Fax 214.744.5101  
E-mail: [arich@alanrichlaw.com](mailto:arich@alanrichlaw.com)

**NOTE NEW MAILING ADDRESS!**

## **INVOICE FOR PROFESSIONAL SERVICES (January, 2010)**

### **Client**

**Hon. Alexander M. Sanders, Legal Representative for Future Asbestos-Related Property Damage Claimants and Holders of Demands**

### **Matter**

***In re W. R. Grace, No. 01-1139 (Bankr. D. Del)***

<u>Date</u>	<u>Services Performed</u>	<u>Time</u>
1/2/2010	Review emails re format of final arguments	0.1
1/3/2010	Prepare and file Sixteenth Fee Application	1.5
1/3/2010	Review emails re format of final arguments	0.1
1/3/2010	Review Libby Claimants' Demonstrative for Closing Argument	0.1
1/3/2010	Attend telephonic meet and confer re closing argument format issues	0.5
1/3/2010	Emails to and from Plan Proponents' counsel re Intercreditor Agreement and Review of Intercreditor Agreement	0.5
1/3/2010	Travel (non-productive) from Dallas to Pittsburgh (3.6 hrs. @ 50%)	1.8
1/3/2010	Review Plan Proponents' Demonstratives	0.4

1/4/2010	Closing Arguments (Day 1)	9.3
1/4/2010	Review Garlock demonstratives	0.3
1/4/2010	Preparation for closing argument	0.5
1/5/2010	Closing Arguments (Day 2)	10.3
1/5/2010	Review Lenders' Demonstratives	0.2
1/6/2010	Closing Arguments (Day 3)	5.3
1/6/2010	Travel (non-productive) from Pittsburgh to Dallas (7.4 hrs. @ 50%)	3.7
1/7/2010	Review Zurich's notice of withdrawal of objections and filings	0.1
1/7/2010	Review Certification of Counsel re continuance of Munoz matter to April Omnibus	0.1
1/7/2010	Review Monthly Operating Report (Nov. 09)	0.3
1/7/2010	Review Order approving AG Settlement	0.1
1/7/2010	Prepare and file Judge Sanders' 11th Fee Application	0.7
1/8/2010	Review Response of PI FCR to Canadian ZAI Special Counsel Application	0.1
1/8/2010	Review Response of the Crown to the Canadian ZAI Special Counsel Application	2.0
1/11/2010	Conference with client re January Omnibus	0.1
1/13/2010	Review Certification of Counsel re General Insurance POC	0.1
1/13/2010	Review Deposition Notice to Seaton Insurance	0.1
1/13/2010	Review Order resetting February Omnibus hearing	0.1
1/13/2010	Review of Debtors' exit financing documents	1.3

1/13/2010	Review Objection of Canada to Plan	2.0
1/13/2010	Email to client re Canadian ZAI	0.1
1/14/2010	Conference with client re Canadian ZAI issue	0.1
1/15/2010	Review Order re Anderson Memorial Brief	0.1
1/15/2010	Review Motion to Amend ART Credit Agreement	0.2
1/15/2010	Review Motion to Approve Claims Resolution Protocol for Employee Claims	0.2
1/15/2010	Email to client re exit financing engagement letters and review of filed motion re same	0.3
1/15/2010	Review Reply brief and motion for leave to file of the CCAA representative counsel re the motion to retain CCAA as special counsel	0.5
1/16/2010	Email to client re rescheduling of February Omnibus	0.1
1/18/2010	Review Motion to Terminate DIP facility and enter Hedging and LOC agreements	2.5
1/19/2010	Review Order granting CCAA counsel leave to reply	0.1
1/20/2010	Review agenda for January 25 Omnibus hearing	0.2
1/20/2010	Review Plan Proponents' Response to Canada's objections to Plan	1.0
1/20/2010	Email from debtors' counsel re omnibus hearing	0.1
1/23/2010	Review Ordinary Course Professional Payments 4Q09	0.2
1/24/2010	Travel (non-productive) from Dallas to Wilmington (5.6 hrs.@ 50%)	2.8
1/25/2010	Attend Omnibus hearing/conclusion of closing arguments and conference with client	6.0
1/25/2010	Travel (non-productive) from Wilmington to Dallas (6.6 hrs.@ 50%)	3.3

1/26/2010	Prepare and file Certificate of No Objection re 16th Monthly Fee Application	0.2
1/26/2010	Review Stipulation extending briefing schedule in BNSF appeal	0.1
1/28/2010	Prepare and file Certificate of No Objection re 11th Monthly Fee Application of PD FCR	0.2
1/29/2010	Review Debtors' Motion for Entry of an Order Authorizing Debtors to Make Legally Required Minimum Contributions to Defined Benefit Pension Plans Covering Debtors' Employees, Due April 2010	0.3
1/29/2010	Debtors' Report of di minimus asset sales for 34th Quarter	0.1
1/29/2010	Debtors' Report of di minimus settlements for 34th Quarter	0.1
1/29/2010	Review withdrawal by Allianz of objections and motions	0.1

Total: 60.6 hours @ \$600.00/hour = \$36,360.00

Expenses: Detail on Exhibit 1– \$2,415.28

**Total Fees and Expenses Due: \$38,775.28**

DATE	DESCRIPTION OF EXPENSE	AMOUNT
1/3/2010	Round Trip Coach Airfare DFW-PIT (closing arguments)	\$715.90
1/3-6/2010	Hotel in Pittsburgh (3 nights)	\$875.52
1/3/2010	Taxi	\$45.40
1/3/2010	Dinner	\$27.08
1/4/2010	Lunch (with PDFCR and Counsel for PD Committee)	\$64.10
1/4/2010	Dinner	\$44.86
1/6/2010	Dinner	\$11.53
1/6/2010	Taxi	\$42.00
1/6/2010	Parking at DFW Airport	\$53.00
1/24/2010	Round Trip Coach Airfare DFW-PHL (omnibus & closing arguments)	\$299.40
1/24/2010	Rental Car, Gas and Parking	\$36.02
1/25/2010	Hotel	\$131.92
1/25/2010	Lunch (with PDFCR)	\$26.55
1/25/2010	Parking at DFW Airport	\$42.00
	<b>TOTAL</b>	<b>\$2,415.28</b>

# **EXHIBIT 2**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>W. R. GRACE &amp; CO., et al.,</b>	§	<b>Case No. 01-01139 (JKF)</b>
	§	
<b><i>Debtors.</i></b>	§	<b>Jointly Administered</b>
	§	
	§	<b>Objection Deadline: 3/22/2010</b>
	§	<b>Hearing Date: TBD (if needed)</b>

**SUMMARY OF APPLICATION OF ALAN B. RICH, ESQ. FOR  
COMPENSATION FOR SERVICES AND REIMBURSEMENT OF  
EXPENSES AS COUNSEL TO THE LEGAL REPRESENTATIVE FOR  
FUTURE ASBESTOS-RELATED PROPERTY DAMAGE CLAIMANTS AND  
HOLDERS OF DEMANDS FOR THE EIGHTEENTH MONTHLY INTERIM  
PERIOD FROM FEBRUARY 1, 2010 THROUGH FEBRUARY 28, 2010**

Name of Applicant:	Alan B. Rich, Esq.
Authorized to Provide Services To:	Hon. Alexander M. Sanders, Jr., Legal Representative for Future Asbestos- Related Property Damage Claimants and Holders of Demands
Date of Retention:	September 29, 2008 ( <i>nunc pro tunc</i> )
Period for Which Compensation and Reimbursement is Sought:	January 1, 2010 through January 31, 2010
Amount of Fees Sought as Actual Reasonable and Necessary:	\$7,392.00 [80% of \$9,240.00]
Amount of Expenses Sought as Actual, Reasonable and Necessary:	\$187.00
This is a(n):	<input checked="" type="checkbox"/> Monthly <input type="checkbox"/> Interim <input type="checkbox"/> Final Application



PRIOR APPLICATIONS

Date Filed	Period Covered	Requested Fees <sup>1</sup>	Requested Expenses	Status of Fees	Status of Expenses
11/15/2008	9/29/2008 to 9/30/2008	\$5,796.00	\$693.50	Paid	Paid
11/15/2008	10/1/2008 to 10/30/2008	\$24,380.00	\$3,821.18	Paid	Paid
12/11/2008	11/1/2008 to 11/30/2008	\$35,326.00	\$4,010.79	Paid	Paid
1/2/2009	12/1/2008 to 12/31/2008	\$18,510.00	\$1,482.39	Paid	Paid
2/1/2009	1/1/2009 to 1/31/2009	\$31,740.00	\$2,717.34	Paid	Paid
3/2/2009	2/1/2009 to 2/28/2009	\$32,614.00	\$2,420.56	Paid	Paid
4/2/2009	3/1/2009 to 3/31/2009	\$27,186.00	\$4,556.30	Paid	Paid
5/5/2009	4/1/2009 to 4/30/2009	\$25,898.00	\$2,612.62	Paid	Paid
6/2/2009	5/1/2009 to 5/31/2009	\$56,304.00	\$5,301.01	Paid	Paid
7/1/2009	6/1/2009 to 6/30/2009	\$56,902.00	\$7,769.09	Paid	Paid
8/22/2009	7/1/2009 to 7/31/2009	\$40,296.00	\$4,279.60	Paid	Paid
9/1/2009	8/1/2009 to 8/31/2009	\$56,442.00	\$6,484.97	Paid	Paid
10/1/2009	9/1/2009 to 9/30/2009	\$65,184.00	\$6,064.05	Paid	Paid
11/1/2009	10/1/2009 to 10/31/2009	\$28,848.00	\$2,337.16	Paid	Paid
12/1/2009	11/1/2009 to 11/30/2009	\$16,176.00	\$10.35	Paid	Paid
1/3/2010	12/1/2009 to 12/31/2009	\$7,200.00	\$194.00	Paid	Paid

---

<sup>1</sup> At 80% of the total incurred.

2/1/2010	1/1/2010 to 1/31/2010	\$29,088	\$2,415.28	CNO Filed	CNO Filed

Alan B. Rich is the only attorney providing services in this Fee Application period. Mr. Rich has practiced law for 25 years, and his billing rate is \$600 per hour. In this Application period Mr. Rich billed 15.4 hours,<sup>2</sup> for a total amount billed of \$9,240.00 of which 80% is currently sought, in the amount of \$7,392.00, plus 100% of the expenses incurred during this period, in the amount of \$187.00, for a total currently sought of \$7,579.00.

As stated above, this is the Seventeenth application for monthly fees and expenses. The time for preparation of this Application is approximately 1.5 hours, for which \$900.00 will be requested in a future application.

#### COMPENSATION BY PROJECT CATEGORY

Project Category	Hours	Amount
Confirmation	8.4	\$5,040.00
Fee Application Matters (Incl. Monthly and Quarterly Applications of FCR & Local Counsel)	7.0	\$4,200.00
TOTAL	15.4 hours	\$9,240.00

---

<sup>2</sup> Non-Productive travel time, if any, is included in this figure, but at 50% of the actual time.

EXPENSE SUMMARY

Description	Expense
Airline Cancellation Fee (Change to Telephone Omnibus hearing)	\$150.00
Courtcall	\$37.00
TOTAL	\$187.00

Detail of the fees and expenses billed is attached hereto as Exhibit A.

CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 2016-2(f)

I, Alan B. Rich, a professional person seeking approval of this Monthly Fee Application, and having reviewed the requirements of Local Rule 2016-2, hereby certify that in my opinion, this Monthly Fee Application complies with Local Rule 2016-2.

Respectfully Submitted,



---

Alan B. Rich, Esq.  
Texas Bar No. 16842350  
1201 Elm Street, Suite 4244  
Dallas, Texas 75270  
(214) 744-5100  
(214) 744-5101 [fax]  
[arich@alanrichlaw.com](mailto:arich@alanrichlaw.com)

COUNSEL TO HON. ALEXANDER  
M. SANDERS, JR., LEGAL  
REPRESENTATIVE FOR FUTURE  
ASBESTOS-RELATED PROPERTY  
DAMAGE CLAIMANTS AND HOLDERS  
OF DEMANDS

**CERTIFICATE OF SERVICE**

I certify that on the 2<sup>nd</sup> day of March, 2010, this document was served through the ECF system on all persons who have requested notice through the ECF system, and upon the special notice parties by electronic mail.



A handwritten signature in black ink, appearing to read "MBRIL", is positioned above a horizontal line.

---

# **EXHIBIT A**

# Alan B. Rich

*Attorney and Counselor*  
4244 Renaissance Tower  
1401 Elm Street  
Dallas, Texas 75270  
Telephone 214.744.5100  
Fax 214.744.5101  
E-mail: [arich@alanrichlaw.com](mailto:arich@alanrichlaw.com)

**NOTE NEW MAILING ADDRESS!**

## **INVOICE FOR PROFESSIONAL SERVICES (February, 2010)**

### **Client**

**Hon. Alexander M. Sanders, Legal Representative for Future Asbestos-Related Property Damage Claimants and Holders of Demands**

### **Matter**

***In re W. R. Grace, No. 01-1139 (Bankr. D. Del)***

<u>Date</u>	<u>Services Performed</u>	<u>Time</u>
2/1/2010	Prepare and file 17th monthly fee application	1.5
2/4/2010	Email from debtors' counsel re Neutrality Stipulation	0.2
2/4/2010	Conference with client re expense issue	0.1
2/5/2010	Prepare Quarterly Fee Application for the 35th Quarterly Period	2.5
2/8/2010	Review Monthly Operating Report (December 2009)	0.4
2/8/2010	Review Stipulation regarding Insurers' Section 502(e) Objections	0.2
2/8/2010	Review Certification of Counsel and Pre-Trial Submission regarding Canadian claims to be tried in April, 2010	0.2
2/8/2010	Filing of Notice of Address Change	0.2

2/8/2010	Revisions to and Filing and Service of 35th Quarterly Fee Application	0.4
2/8/2010	Review Insurance Neutrality Stipulation in preparation for February Omnibus hearing	0.4
2/9/2010	Review Certificate of No Objection to Termination of DIP and new LOC and Hedging Agreement	0.1
2/9/2010	Conference with client re February Omnibus hearing	0.1
2/9/2010	Review Certificate of No Objection to Extension of Advanced Refining Credit Agreement	0.1
2/9/2010	Prepare PD FCR's 35th Quarter Fee Application	1.5
2/9/2010	Review Certificate of No Objection to Exit Financing Engagement Letters and Fee Payments	0.1
2/9/2010	Prepare and file PD FCR's 12th Monthly Fee Application	0.8
2/9/2010	Review Certificate of No Objection re Insurance Neutrality Stipulation	0.1
2/9/2010	Review Withdrawal of CNO regarding DIP termination, etc.	0.1
2/10/2010	Review Certification of Counsel re Employee Benefits Claims Resolution Protocol	0.2
2/10/2010	Review Agenda for February Omnibus hearing	0.2
2/10/2010	Review Draft Certification of Counsel re Termination of DIP facility and entry into new LOC and Hedging Agreements and revised proposed Order and agreements	0.6
2/10/2010	Review Revised Draft of Certification of Counsel re Termination of DIP Facility and entry into new LOC and Hedging Agreements	0.2
2/11/2010	Email from Debtors' counsel re February Omnibus hearing	0.1
2/11/2010	Attention to arrangements for telephonic appearance at February Omnibus hearing	0.1

2/11/2010	Review Amended Agenda for February Omnibus hearing	0.1
2/12/2010	Telephone conference with client re February Omnibus hearing	0.1
2/12/2010	Review Stipulation regarding Kaneb issues	0.1
2/15/2010	Review Amended Stipulation regarding Kaneb issues	0.1
2/15/2010	Review Second Amended Agenda for February Omnibus hearing	0.1
2/15/2010	Review Motion to Make Contribution to Employee Benefits Plans	0.2
2/15/2010	Email from Debtor regarding December Monthly Operating Report	0.1
2/16/2010	Review Notice of Errata to Certification of Counsel regarding DIP Financing termination, etc. Motion	0.1
2/16/2010	Review Stipulation between One Beacon and Plan Proponents	0.3
2/16/2010	Review Third Amended Agenda for February Omnibus hearing	0.1
2/16/2010	Attend telephonic February Omnibus Hearing	0.8
2/16/2010	Review Order approving Insurance Neutrality Stipulation	0.1
2/16/2010	Review Order authorizing entry into exit financing engagement letters	0.1
2/16/2010	Review Order authorizing extension of ART financing	0.1
2/16/2010	Review Order approving new LOC facility	0.2
2/16/2010	Review Order approving employee benefit claim protocol	0.1
2/17/2010	Emails to and from Bondholder re status of property damage claims	0.2
2/18/2010	Email from Scott Baena re bondholder request	0.1
2/19/2010	Review Order staying BNSF appeal	0.1
2/19/2010	Emails to and from client re Bondholder issue	0.1



2/22/2010	Email from Debtors' counsel re conference call on Retirement Plan issues	0.1
2/22/2010	Review Withdrawal of Appearance of David Bernick	0.1
2/23/2010	Emails to and from Fee Examiner re PD FCR quarterly application and re ABR quarterly application	0.3
2/23/2010	Conference call regarding Debtors' retirement plan issues	0.5
2/23/2010	Prepare and file CNO re 17th monthly fee application	0.2
2/24/2010	Conference with client re new expense guidelines	0.2
2/24/2010	Review Certification of Counsel re Withdrawal of Objection to Seaton Claim and proposed order	0.2
2/25/2010	Review Stipulation resolving Morgan Stanley objections	0.1
2/25/2010	Review Order withdrawing objection to Seaton claim	0.1

Total: 15.4 hours @ \$600.00/hour = \$9,240.00

Expenses: Detail on Exhibit 1– \$187.00

**Total Fees and Expenses Due: \$9,427.00**

DATE	DESCRIPTION OF EXPENSE	AMOUNT
2/16/2010	Airline Ticket Cancellation Penalty (Omnibus changed to Telephone only)	\$150.00
2/16/2010	Court Call (February Omnibus hearing)	\$37.00
	TOTAL EXPENSES	\$187.00

# **EXHIBIT 3**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>W. R. GRACE &amp; CO., et al.,</b>	§	<b>Case No. 01-01139 (JKF)</b>
	§	
<b><i>Debtors.</i></b>	§	<b>Jointly Administered</b>
	§	
	§	<b>Objection Deadline: 4/21/2010</b>
	§	<b>Hearing Date: TBD (if needed)</b>

**SUMMARY OF APPLICATION OF ALAN B. RICH, ESQ. FOR  
COMPENSATION FOR SERVICES AND REIMBURSEMENT OF  
EXPENSES AS COUNSEL TO THE LEGAL REPRESENTATIVE FOR  
FUTURE ASBESTOS-RELATED PROPERTY DAMAGE CLAIMANTS AND  
HOLDERS OF DEMANDS FOR THE NINETEENTH MONTHLY INTERIM  
PERIOD FROM MARCH 1, 2010 THROUGH MARCH 31, 2010**

Name of Applicant:	Alan B. Rich, Esq.
Authorized to Provide Services To:	Hon. Alexander M. Sanders, Jr., Legal Representative for Future Asbestos- Related Property Damage Claimants and Holders of Demands
Date of Retention:	September 29, 2008 ( <i>nunc pro tunc</i> )
Period for Which Compensation and Reimbursement is Sought:	March 1, 2010 through March 31, 2010
Amount of Fees Sought as Actual Reasonable and Necessary:	\$7,200.00 [80% of \$9,000.00]
Amount of Expenses Sought as Actual, Reasonable and Necessary:	\$150.56
This is a(n):	<input checked="" type="checkbox"/> Monthly <input type="checkbox"/> Interim <input type="checkbox"/> Final Application

PRIOR APPLICATIONS

Date Filed	Period Covered	Requested Fees <sup>1</sup>	Requested Expenses	Status of Fees	Status of Expenses
11/15/2008	9/29/2008 to 9/30/2008	\$5,796.00	\$693.50	Paid	Paid
11/15/2008	10/1/2008 to 10/30/2008	\$24,380.00	\$3,821.18	Paid	Paid
12/11/2008	11/1/2008 to 11/30/2008	\$35,326.00	\$4,010.79	Paid	Paid
1/2/2009	12/1/2008 to 12/31/2008	\$18,510.00	\$1,482.39	Paid	Paid
2/1/2009	1/1/2009 to 1/31/2009	\$31,740.00	\$2,717.34	Paid	Paid
3/2/2009	2/1/2009 to 2/28/2009	\$32,614.00	\$2,420.56	Paid	Paid
4/2/2009	3/1/2009 to 3/31/2009	\$27,186.00	\$4,556.30	Paid	Paid
5/5/2009	4/1/2009 to 4/30/2009	\$25,898.00	\$2,612.62	Paid	Paid
6/2/2009	5/1/2009 to 5/31/2009	\$56,304.00	\$5,301.01	Paid	Paid
7/1/2009	6/1/2009 to 6/30/2009	\$56,902.00	\$7,769.09	Paid	Paid
8/22/2009	7/1/2009 to 7/31/2009	\$40,296.00	\$4,279.60	Paid	Paid
9/1/2009	8/1/2009 to 8/31/2009	\$56,442.00	\$6,484.97	Paid	Paid
10/1/2009	9/1/2009 to 9/30/2009	\$65,184.00	\$6,064.05	Paid	Paid
11/1/2009	10/1/2009 to 10/31/2009	\$28,848.00	\$2,337.16	Paid	Paid
12/1/2009	11/1/2009 to 11/30/2009	\$16,176.00	\$10.35	Paid	Paid
1/3/2010	12/1/2009 to 12/31/2009	\$7,200.00	\$194.00	Paid	Paid

---

<sup>1</sup> At 80% of the total incurred.

2/1/2010	1/1/2010 to 1/31/2010	\$29,088.00	\$2,415.28	Paid	Paid
3/2/2010	2/1/2010 to 2/28/2010	\$7,392.00	\$187.00	CNO Filed	CNO Filed

Alan B. Rich is the only attorney providing services in this Fee Application period. Mr. Rich has practiced law for 25 years, and his billing rate is \$600 per hour. In this Application period Mr. Rich billed 15.0 hours,<sup>2</sup> for a total amount billed of \$9,000.00 of which 80% is currently sought, in the amount of \$7,200.00, plus 100% of the expenses incurred during this period, in the amount of \$150.56, for a total currently sought of \$7,350.56.

As stated above, this is the Nineteenth application for monthly fees and expenses. The time for preparation of this Application is approximately 1.5 hours, for which \$900.00 will be requested in a future application.

#### COMPENSATION BY PROJECT CATEGORY

Project Category	Hours	Amount
Confirmation	12.0	\$7,200.00
Fee Application Matters (Incl. Monthly and Quarterly Applications of FCR & Local Counsel)	3.0	\$1,800.00
TOTAL	15.0 hours	\$9,000.00

---

<sup>2</sup> Non-Productive travel time, if any, is included in this figure, but at 50% of the actual time.

EXPENSE SUMMARY

Description	Expense
Airline Cancellation Fee (Change to Telephone Omnibus hearing)	\$150.00
Pacer	\$0.56
TOTAL	\$150.56

Detail of the fees and expenses billed is attached hereto as Exhibit A.

CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 2016-2(f)

I, Alan B. Rich, a professional person seeking approval of this Monthly Fee Application, and having reviewed the requirements of Local Rule 2016-2, hereby certify that in my opinion, this Monthly Fee Application complies with Local Rule 2016-2.

Respectfully Submitted,



---

Alan B. Rich, Esq.  
Texas Bar No. 16842350  
1201 Elm Street, Suite 4244  
Dallas, Texas 75270  
(214) 744-5100  
(214) 744-5101 [fax]  
[arich@alanrichlaw.com](mailto:arich@alanrichlaw.com)

COUNSEL TO HON. ALEXANDER  
M. SANDERS, JR., LEGAL  
REPRESENTATIVE FOR FUTURE  
ASBESTOS-RELATED PROPERTY  
DAMAGE CLAIMANTS AND HOLDERS  
OF DEMANDS

**CERTIFICATE OF SERVICE**

I certify that on the 1<sup>st</sup> day of April, 2010, this document was served through the ECF system on all persons who have requested notice through the ECF system, and upon the special notice parties by electronic mail.

A handwritten signature in black ink, appearing to read "MBRIL", is positioned above a horizontal line.



# **EXHIBIT A**

## ALAN B. RICH

*Attorney and Counselor*  
4244 Renaissance Tower  
1401 Elm Street  
Dallas, Texas 75270  
Telephone 214.744.5100  
Fax 214.744.5101  
E-mail: [arich@alanrichlaw.com](mailto:arich@alanrichlaw.com)

### **INVOICE FOR PROFESSIONAL SERVICES (March, 2010)**

#### **Client**

**Hon. Alexander M. Sanders, Legal Representative for Future Asbestos-Related Property Damage Claimants and Holders of Demands**

#### **Matter**

***In re W. R. Grace, No. 01-1139 (Bankr. D. Del)***

<u>Date</u>	<u>Services Performed</u>	<u>Time</u>
3/1/2010	Review Twenty-Eighth Omnibus Objection to Employee Claims	0.5
3/1/2010	Review Certification of Counsel Regarding Resolution of Crown Appeal of Amended and Restated Canadian ZAI Minutes of Settlement	0.3
3/2/2010	Prepare and file 18th Monthly Fee Application	1.5
3/2/2010	Prepare and file Certificate of No Objection re the PD FCR's 12th Monthly Fee Application	0.1
3/2/2010	Prepare and file Certificate of No Objection re the 35 <sup>th</sup> Quarterly Fee Period Application	0.1
3/2/2010	Prepare and file Certificate of No Objection re the 35 <sup>th</sup> Quarterly Fee Period Application of the PD FCR	0.1
3/4/2010	Email from Debtors' counsel re pension plan conference	0.1

3/4/2010	Review draft of proposed key employee incentive plan for 2010-2012 and emails to R. Wyron re same	0.6
3/5/2010	Review Monthly Operating Report for January 2010	0.4
3/8/2010	Review Maryland Casualty Response to Debtors' claim objection	0.5
3/9/2010	Review Fee Auditors' Report on 34th Quarterly Application period and email to client re same	0.2
3/9/2010	Review Property Damage Settlement Motions for Health Care Corporation of St. John's, McMaster University, Mourguard Investments, Toronto District School Board and Hamilton Wentworth District School Board	0.6
3/9/2010	Review Libby Claimants' Joinder in Debtors' Objection to Maryland Casualty Claims	0.1
3/10/2010	Telephone Conference with client	0.1
3/10/2010	Email from R. Wyron re LTIP Motion	0.1
3/11/2010	Review Fee Auditor's Amended Final Report for 34th Quarter	0.2
3/11/2010	Email from Debtors' counsel re March Omnibus hearing	0.1
3/12/2010	Preparation and filing of the 13th Monthly Fee Application of PD FCR and notice thereof	0.5
3/15/2010	Review Certification of Counsel re 34th Quarterly Fee Applications	0.1
3/15/2010	Review Certification of Counsel re 34th Quarterly Project Categories	0.1
3/15/2010	Review Agenda for March Omnibus hearing	0.2
3/17/2010	Email from Debtors' counsel re March Omnibus hearing	0.1
3/17/2010	Review Order approving 34th Quarterly Fee Applications	0.1

3/18/2010	Review Joint Motions to enter Stipulations resolving Plan Objections of National Union and Longacre	0.4
3/18/2010	Review Amended Agenda for March Omnibus hearing	0.1
3/18/2010	Review Certificate of No Objection re motion to make contributions to defined benefit plans	0.1
3/18/2010	Review Motion to implement Long Term Incentive Plan	0.2
3/18/2010	Review Property Damage Settlement Motions for City of Vancouver, Avalon East School District, Fairmall Leaseholds, Atlantic Shopping Mall, Conseillers Immobiliers and University of Guelph	0.5
3/19/2010	Review Second Amended Agenda for March Omnibus hearing	0.2
3/19/2010	Review Stipulation Among the Plan Proponents and CNA Regarding Certain Actions Against Sealed Air	0.3
3/19/2010	Review Certification of Counsel re Canadian ZAI Claimants Application for Appointment of Special Counsel and of Counsel to the Representative Counsel	0.3
3/19/2010	Review Joinder of the PI FCR is Debtors' Objections to Maryland Casualty Claims	0.1
3/19/2010	Review Order Striking Pro Se Intervention	0.1
3/19/2010	Conference with client re March Omnibus	0.1
3/19/2010	Email from Debtors' counsel re March Omnibus	0.1
3/19/2010	Review Notice of Withdrawal of CAN Stipulation	0.1
3/22/2010	Review replacement Stipulation Among the Plan Proponents and CNA Regarding Certain Actions Against Sealed Air	0.2
3/22/2010	Conference with client re March Omnibus	0.1
3/22/2010	Review Third Amended Agenda for March Omnibus	0.1

3/22/2010	Review of Fourth Set of Plan Modifications and emails to and from Plan Proponents re same	2.0
3/22/2010	Review Revised Chart of Objections and Confirmation Requirements	0.5
3/24/2010	Prepare CNO for 18th Monthly Fee Application	0.2
3/24/2010	Emails to and from client re PD FCR fee application	0.1
3/24/2010	Email from debtor re PD FCR's January fees	0.1
3/25/2010	Emails to and from R. Wyron re LTIP Motion issues	0.2
3/26/2010	Review revisions to LTIP Certification of Counsel	0.2
3/26/2010	Review Modified Order Granting the Canadian ZAI Claimants' Application for Appointment of Special Counsel	0.1
3/26/2010	Order Authorizing Debtors to Make Legally Required Minimum Contributions to Defined Benefit Pension Plans Covering Debtors' Employees, Due April 2010	0.1
3/26/2010	Review Notice of Hearing re March Omnibus matters for hearing at April Omnibus	0.1
3/29/2010	Emails to and from debtors' counsel re conference call	0.1
3/30/2010	Conference call re Pension Plan issues	0.5
3/30/2010	Review Certificates of No Objection regarding PD Settlement Motions for Health Care Corporation of St. John's, McMaster University, Mourguard Investments, Toronto District School Board and Hamilton Wentworth District School Board	0.3
3/30/2010	Review Certificates of No Objection regarding compromises of Longacre and National Union classification motions	0.1
3/30/2010	Review Motion to approve final fee applications in the fraudulent transfer litigation	0.2

3/30/2010	Review Rule 9019 Motion re settlement of Employers Mutual Casualty Company, Mutual Marine Office, Inc., Pacific Mutual Marine Office, Inc., and Mutual Marine Office of the Midwest Claims	0.2
3/30/2010	Review Bank Lender Group's Reservation Of Rights And Limited Response To Plan Proponents' Updated And Amended Chart Summarizing Confirmation Requirements And Remaining Objections To The First Amended Joint Plan Of Reorganization	0.2
3/31/2010	Prepare CNO for Judge Sanders' 13th Fee Application	0.1

Total: 15.0 hours @ \$600.00/hour = \$9,000.00

Expenses: Detail on Exhibit 1– \$150.56

**Total Fees and Expenses Due: \$9,150.56**

DATE	DESCRIPTION OF EXPENSE	AMOUNT
3/22/2010	Airline Ticket Cancellation Penalty (Omnibus changed to Telephone only)	\$150.00
3/22/2010	Pacer	\$0.56
	TOTAL EXPENSES	\$150.56